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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

MICHAEL FIRESTONE and LINDSAY
BERSCHAUER, individually and as husband
and wife; KATERINA EYRE, an individual;
TAYLER HAYWARD, an individual; LISA
LEDSON, an individual, THOMAS REILLY,
an individual, and GERALD EARL
CUMMINGS, II, an individual,

Case No: 3:24-cv-01034-SI

**DECLARATION OF TAYLER
HAYWARD**

Plaintiffs,

v.

JANET YELLEN, in her official capacity as the
Secretary of the United States Department of the
Treasury, UNITED STATES DEPARTMENT
OF THE TREASURY, and ANDREA GACKI,
in her official capacity as Acting Director of the
Financial Crimes Enforcement Network,

Defendants.

Declaration of Tayler Hayward

4858-1709-4396

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I, Tayler Hayward, make the following declaration under penalty of perjury pursuant to the laws of the United States:

1. I am over the age of 18, am under no legal disability, and am competent to testify. If called as a witness, I would and could testify competently to the facts set forth in this declaration based on my personal knowledge.

2. I am the organizer, registered agent and member-owner of Ellisons, LLC. I am a beneficial owner of this entity.

3. Ellisons, LLC is an Oregon limited company that sells handmade jewelry at local markets and online.

4. I formed Ellisons, LLC after moving to Oregon this year. I did so by filing with the Oregon Secretary of State an assumed business name on March 21, 2024, after moving my business here from California.

5. As an entity registered in 2024 with the Oregon Secretary of State, Ellisons, LLC was required to comply with the Corporate Transparency Act (“CTA”) within 90 days to the Financial Crimes Enforcement Network (“FinCEN”). As a micro business owner and college student, I do not qualify for a large corporate entity exemption because my company will not have \$5 million in sales and 20 employees.


6. This year, because of my school and day job, I do not anticipate that I will earn enough in net sales in my small business to cover the cost of obtaining professional help to comply with the CTA. For this reason, I object to a law that will burden micro businesses like mine with labor hours and monetary costs to ensure we properly comply with the CTA when other companies were exempted from having to do the same.

7. As a micro business owner, and at age 21, being fairly new to running a business, I rely on the advice of friends and family who do not own a stake in my business to help me make business decisions. The CTA violates my right to associational freedom because some of those people might be considered under the law as having ‘substantial control’ of my business

and would therefore be required to be listed as a beneficial owner. For that reason, I believe the CTA violates my First Amendment rights and should be declared unconstitutional.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on 11/18/2024

DocuSigned by:

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Tayler Hayward